

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BOOZ ALLEN HAMILTON, INC., et al.,

Defendants.

Case No.: 1:22-cv-01603-CCB

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 104.7**

Pursuant to Local Rule 104.7, I hereby certify that counsel for the Defendants have conferred with counsel for Plaintiff United States of America (“DOJ”) in a good-faith effort to resolve the discovery differences that were the subject of the attached Motion to Compel Investigation Materials Withheld on the Basis of Privilege (“Motion”). The parties have been unable to resolve the issues that were the subject of the Motion. The initial Motion was not served until after Defendants and DOJ had met and conferred multiple times regarding the issues and also exchanged correspondence regarding the same.

Additionally, Defendants’ counsel and DOJ have met and conferred regarding the Motion on August 18, 2022, at 8 PM, via teleconference between Marguerite Sullivan, Christopher Brown, G. Charles Beller, Todd Stenerson, Matthew Modell, Jacob Coate, Jay Own, Alexander Cohen, Steven Kramer, and Arianna Markel. This August 18, 2022 conference took place after the parties completed their motion to compel briefing on August 17, 2022, per Local Rule 104.8(b). Despite good-faith efforts, the parties were not able to resolve the discovery disputes discussed in Defendants’ Reply Brief in Support of their Motion to Compel. The issues still requiring resolution are:

- Whether Plaintiff should shall produce, in full (1) all documents withheld, in whole or in part, solely on the basis of the deliberative process privilege; (2) all documents withheld, in whole or in part, on grounds on the deliberative process and attorney-client privilege; and (3) all documents withheld on the ground of attorney work product, insofar as those documents are described as “requesting” or “conveying” information and do not purport to contain attorney mental impressions;
- Whether Plaintiff should review all documents not produced in full for factual material and produce to Defendants updated copies with that factual material unredacted; and
- Whether the parties should agree to a set of documents to identify for the Court to review *in camera*.

Each of these pending issues is discussed in more detail in the attached and the previously served Defendants’ Motion to Compel (Ex. A), and Plaintiff’s Opposition thereto (Ex. B), and Defendants Reply in Support of Defendants’ Motion to Compel (Ex. C.).

Dated: August 18, 2022

/s/ G. Charles Beller

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## **CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the sealed documents to be served on upon the following in the manner indicated:

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